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9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 SHIREHAMPTON DRIVE TRUST,

13 Plaintiff,

14 v.

15 JPMORGAN CHASE BANK, NATIONAL
16 ASSOCIATION; MTC FINANCIAL INC.
17 DBA TRUSTEE CORPS; LOUISA
18 OAKENELL; and UNITED STATES OF
AMERICA TREASURY DEPARTMENT,
INTERNAL REVENUE SERVICE,

19 Defendants.
20

CASE NO.: 2:16-cv-02276-RFB-GWF

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
FILE REPLIES IN SUPPORT OF
MOTIONS FOR SUMMARY
JUDGMENT**

(First Request)

21 JPMORGAN CHASE BANK, N.A.,

22 Counterclaimant,
23

24 v.

25 SHIREHAMPTON DRIVE TRUST; DOES
26 1 through 10, inclusive; and ROE
CORPORATIONS 1 through 10, inclusive,

27 Counterdefendants.
28

1 Plaintiff Shirehampton Drive Trust ("Plaintiff"), and Defendants JPMorgan Chase
2 Bank, N.A. ("Chase") and United States of America ("United States"), by and through their
3 respective counsel of record, hereby agree as follows:

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5 1. On September 24, 2018, Plaintiff,¹ Chase, and United States each filed motions
6 for summary judgment in this action. [ECF Nos. 42, 43, 44, and 45.]

7 2. On October 12, 2018, United States filed its opposition to Plaintiff's Motion
8 for Summary Judgment against the IRS. [ECF No. 47.]

9 3. On October 15, 2018, Plaintiff filed its separate oppositions to Chase's and
10 United States' motions for summary judgment, and Chase filed its opposition to Plaintiff's
11 motion for summary judgment. [ECF Nos. 48, 49, and 50.]

12 4. Accordingly, United States' reply brief is currently due to be filed on or before
13 October 26, 2018, and Plaintiff's and Chase's respective reply briefs are currently due to be
14 filed on or before October 29, 2018. (*See* Local Rule 7-2(b).)

15 5. Counsel for Chase will be out of the office October 19, 2018 through October
16 29, 2018, and has therefore requested a brief two-week extension of the reply deadline. For
17 the sake of consistency, the parties desire to modify the deadline for each of the parties' reply
18 briefs from October 26, 2018 (in the case of United States' deadline) and October 29, 2018 (in
19 the case of Plaintiff's and Chase's deadline) to **November 13, 2018**.
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¹ Plaintiff filed separate motions against Chase and United States. [*See* ECF Nos. 44 and 45.]

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6. The parties respectfully submit that the instant stipulation is supported by a showing of good cause, and the extension set forth herein is not requested for purposes of delay.

Dated this 23rd day of October, 2018.

SMITH LARSEN & WIXOM

/s/ Katie M. Weber

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JPMorgan Chase Bank, N.A.

Dated this 23rd day of October, 2018.


LAW OFFICES OF MICHAEL F. BOHN,
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/s/ Adam R. Trippiedi

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Dated this 18th day of October, 2018.

RICHARD E. ZUCKERMAN
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IT IS SO ORDERED:


RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 25th day of October, 2018.